

Docket Nos.: 52-025

ND-21-0715
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
Resubmittal of ITAAC Closure Notification on Completion of ITAAC C.2.6.09.05a [Index Number 664]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.05a [Index Number 664]. This ITAAC confirms that the access control points for the protected area are configured to control personnel and vehicle access. ITAAC C.2.6.09.05a also confirms that the protected area personnel access point detection equipment is capable of detecting firearms, incendiary devices, and explosives. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

Southern Nuclear Operating Company (SNC) previously submitted ITAAC Closure Notification on Completion of ITAAC C.2.6.09.05a [Index Number 664] ND-20-1406 [ML20357B083], dated December 21, 2020. This resubmittal supersedes ND-20-1406 in its entirety.

The resubmittal is required because the original submittal did not include testing of the Primary Vehicle Access Point. The resubmittal also added inspection and testing of the Receiving Warehouse Vehicle Access Point.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,



Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC C.2.6.09.05a [Index Number 664]

MJY/RLB/sfr

To:

Southern Nuclear Operating Company/ Georgia Power Company

Mr. Peter P. Sena III

Mr. D. L. McKinney

Mr. M. D. Meier

Mr. G. Chick

Mr. S. Stimac

Mr. P. Martino

Mr. M. J. Yox

Mr. A. S. Parton

Ms. K. A. Roberts

Mr. C. T. Defnall

Mr. C. E. Morrow

Mr. J. M. Fisher

Mr. R. L. Beilke

Mr. S. Leighty

Ms. A. C. Chamberlain

Mr. J. C. Haswell

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cc:

Nuclear Regulatory Commission

Ms. M. Bailey

Mr. M. King

Mr. G. Bowman

Ms. A. Veil

Mr. C. P. Patel

Mr. G. J. Khouri

Mr. C. J. Even

Mr. B. J. Kemker

Ms. N. C. Coover

Mr. C. Welch

Mr. J. Gaslevic

Mr. O. Lopez-Santiago

Mr. G. Armstrong

Mr. M. Webb

Mr. T. Fredette

Mr. C. Santos

Mr. B. Davis

Mr. J. Vasquez

Mr. J. Eargle

Mr. E. Davidson

Mr. T. Fanelli

Ms. K. McCurry

Mr. J. Parent

Mr. B. Griman

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Oglethorpe Power Corporation

Mr. R. B. Brinkman

Mr. E. Rasmussen

Municipal Electric Authority of Georgia

Mr. J. E. Fuller

Mr. S. M. Jackson

Dalton Utilities

Mr. T. Bundros

Westinghouse Electric Company, LLC

Dr. L. Oriani

Mr. D. C. Durham

Mr. M. M. Corletti

Mr. Z. S. Harper

Mr. J. L. Coward

Other

Mr. S. W. Kline, *Bechtel Power Corporation*

Ms. L. Matis, *Tetra Tech NUS, Inc.*

Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*

Mr. S. Roetger, *Georgia Public Service Commission*

Mr. R. L. Trokey, *Georgia Public Service Commission*

Mr. K. C. Greene, *Troutman Sanders*

Mr. S. Blanton, *Balch Bingham*

**Southern Nuclear Operating Company
ND-21-0715
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC C.2.6.09.05a [Index Number 664]**

ITAAC Statement

5. Access control points are established to:

- a) control personnel and vehicle access into the protected area.
- b) detect firearms, explosives, and incendiary devices at the protected area personnel access points.

Inspections/Tests/Analyses

Tests, inspections, or combination of tests and inspections of installed systems and equipment at the access control points to the protected area will be performed.

Tests, inspections, or combination of tests and inspections of installed systems and equipment at the access control points to the protected area will be performed.

Acceptance Criteria

The access control points for the protected area:

- a) are configured to control personnel and vehicle access.
- b) include detection equipment that is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points.

ITAAC Determination Basis

Tests, inspections or a combination of tests and inspections of installed systems and equipment at the access control points to the protected area were performed to verify the access control points are configured to control personnel and vehicle access, and include detection equipment that is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points. The VEGP Unit 3 Plant Security System ITAACs only cover the Unit 3 plant security system design commitment scope.

a) The access control points for the protected area are configured to control personnel and vehicle access.

An inspection was performed to confirm that protected area personnel and vehicle access control points are installed per approved construction drawings and to ensure the access control points are configured to control personnel and vehicle access per the applicable personnel and vehicle access control requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR Part 73.55(g)(1).

The inspection of the protected area primary personnel access control point confirmed that personnel are channeled to the designated access control point where personnel are processed before being granted access to the protected area. The primary personnel access control point was confirmed to include: 1) a location where identity and authorization for access can be verified, 2) the ability to search equipment and personnel to verify that unauthorized items are not present prior to entry into the protected area, 3) video surveillance equipment that can be monitored by security personnel, and 4) alarmed entry control devices (e.g., doors, gates, turnstiles, card readers, or biometrics) that prevent or delay unauthorized entry into the protected area before completion of the required processing.

The inspection of the protected area primary vehicle access control point confirmed that vehicles are channeled to the designated access control point where vehicles are processed before being granted access to the protected area. The primary vehicle access control point is confirmed to include: 1) active vehicle barriers located outside the Protected Area fence which are remotely controlled from the Central Alarm Station or Secondary Alarm Station 2) video surveillance equipment that can be monitored by security personnel, and 3) a vehicle search isolation area between the inner and outer protected area fence to search vehicles for unauthorized items. Vehicle operators are processed via the protected area primary personnel access control point described in the previous paragraph. Testing of the primary vehicle access control point active vehicle barriers was performed to demonstrate the barriers could be remotely controlled from the Central Alarm Station (CAS) or Secondary Alarm Station (SAS).

The inspection of the protected area Receiving Warehouse vehicle access control point confirmed that vehicles are channeled to a designated access control point where vehicles are processed before being granted access to the protected area. The Receiving Warehouse vehicle access control point is confirmed to include: 1) an active vehicle barrier located outside the Protected Area fence which is remotely controlled from the Central Alarm Station or Secondary Alarm Station 2) video surveillance equipment that can be monitored by security personnel, and 3) a vehicle search area between the Receiving Warehouse and the protected area perimeter fence to search vehicles for unauthorized items. Vehicle operators requiring access to the Protected Area are processed via the protected area primary personnel access control point described in the previous paragraph. Testing of the Receiving Warehouse vehicle access control point active vehicle barrier was performed to demonstrate the barrier could be remotely controlled from CAS or SAS.

The results of the protected area primary personnel and primary vehicle access control point inspections are documented in SV3-SES-ITR-800664 (Reference 1). The Receiving Warehouse vehicle access control point inspection is documented in SV3-SES-ITR-802664 (Reference 2). The results of the primary vehicle and Receiving Warehouse access control point active vehicle barrier testing is documented in SV3-SES-ITR-803664 (Reference 3). Together References 1 through 3 confirm that the protected area access control points are configured to control personnel and vehicle access.

b) The access control points for the protected area include detection equipment that is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points.

Inspection of the primary personnel access point confirmed the access point includes a search area containing metal detectors, explosive detectors, and X-Ray devices configured to prevent unauthorized bypass, and that is capable of detecting firearms, incendiary devices, and explosives, per the applicable personnel access control requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR Part 73.55(h)(3)(i).

Operational testing of the detection equipment was performed following installation to confirm the detection equipment is functioning and performing within design specifications. Walkthrough (portal) metal detectors are used to detect metallic components in weapons; detection of wiring, batteries, and other metallic components of bombs and incendiary devices; and detection of metals used to shield radioactive material. Portal explosive detectors are used to detect trace amounts of explosives. X-Ray imaging equipment is used to inspect the contents of hand carried items and packages for unauthorized items.

The results of the protected area personnel access point detection equipment inspections and testing are documented in SV3-SES-ITR-801664 (Reference 4) and confirm that installed equipment at the protected area personnel access point is capable of detecting firearms, incendiary devices, and explosives.

Together, these reports (References 1 through 4) provide evidence that the following ITAAC Acceptance Criteria requirements are met:

- The access control points for the protected area are configured to control personnel and vehicle access; and
- The access control points for the protected area include detection equipment that is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points.

References 1 through 4 are available for NRC inspection as part of the Unit 3 C.2.6.09.05a ITAAC Completion Package (Reference 5).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review determined that one such finding, listed below, has been identified:

1. Failure to demonstrate that the ITAAC 664 Acceptance Criteria was met—Specifically, this finding was related to not testing the Primary Vehicle Access Point active vehicle barriers to demonstrate that the vehicle access control point was configured to control vehicle access. To address this concern, the following corrective action was taken: testing was completed on the Primary Vehicle Access Point active vehicle barriers to confirm remote operation and control from CAS and SAS.

The corrective action for this finding has been completed. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC C.2.6.09.05a (Reference 5) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC C.2.6.09.05a was performed for VEGP Unit 3 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV3-SES-ITR-800664, Unit 3 ITAAC 664 Walkdown Inspection: ITAAC C.2.6.09.05a, Revision 1
2. SV3-SES-ITR-802664, Unit 3 ITAAC 664 Receiving Warehouse Vehicle Access Walkdown Inspection: ITAAC C.2.6.09.05a, Revision 0

3. SV3-SES-ITR-803664, Unit 3 Primary Vehicle Access Point and Receiving Warehouse Vehicle Access Point Active Vehicle Barrier Testing: ITAAC C.2.6.09.05a, Revision 0
4. SV3-SES-ITR-801664, Unit 3 Personnel Access Point Detection Equipment Testing: ITAAC C.2.6.09.05a, Revision 0
5. C.2.6.09.05a-U3-CP-Rev1, ITAAC Completion Package